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dba Cornerstone Crossings Apartments, Prime Administration. LLC  
dba Prime Group, and Pauletta Dearing*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RENEE JENKINS, an individual,

Case No. 2:20-CV-00653-JCM-DJA

Plaintiff,

v.

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION TO REMAND**

PRIME WASHINGTON, LLC, d/b/a  
CORNERSTONE CROSSINGS  
APARTMENTS, a Delaware limited liability  
company; PRIME ADMINISTRATION,  
LLC, d/b/a PRIME GROUP, a Delaware  
limited liability company; PAULETTA  
DEARINGER, an individual; ROE  
PROPERTY MANAGEMENT COMPANY;  
ROE PROPERTY MANAGER; DOES I-X;  
and ROE BUSINESS ENTITIES XI-XX,  
inclusive,

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by Defendants PRIME WASHINGTON, LLC, d/b/a CORNERSTONE CROSSINGS APARTMENTS, PRIME ADMINISTRATION, LLC d/b/a PRIME GROUP, and PAULETTA DEARINGER, by and through their counsel of record, Rachel J. Holzer of TYSON & MENDES LLP and Plaintiff RENEE JENKINS, through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, that the deadline for Defendants to file their Response to Plaintiff Renee Jenkins' Motion to Remand (ECF No. 23) shall be extended by seven (7) days, from May 21, 2020 to May 28, 2020. The Motion to Remand was filed on May 7, 2020. This is the first stipulation for extension of time to file Defendants' Response to Plaintiff Renee Jenkins' Motion

1 to Remand. This Stipulation and [Proposed Order] is submitted in accordance with LR IA 6-1 .  
2 There are currently no scheduled hearings in this case. A short extension to file a response will  
3 not unduly delay the proceedings, nor adversely affect or prejudice the parties. This request is  
4 not being made in bad faith. The parties respectfully request this Court to approve the foregoing  
5 stipulation.

6 Dated this 19<sup>th</sup> day of May 2020.

Dated this 19<sup>th</sup> day of May 2020.

7 **PRINCE LAW GROUP**

**TYSON & MENDES, LLP**

8 /s/ Kevin T. Strong

/s/ Rachel J. Holzer

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12 *Attorneys for Plaintiff Renee Jenkins*

*Prime Administration. LLC dba Prime Group,*  
*and Pauletta Dearing*

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15  
16 **ORDER**

17  
18 **IT IS SO ORDERED.**

19 Dated May 20, 2020.

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22 **UNITED STATES DISTRICT JUDGE**